

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

HARTFORD FIRE INSURANCE
COMPANY,

Plaintiff,

v.

TOWN OF WESTON,

Defendant

CIVIL ACTION NO. 05-CV-11166-EFH

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

Pursuant to the Notice of Scheduling Conference dated October 11, 2005, Rule 16(b) of the Federal Rules of Civil Procedure and Local Rule 16.1(D) (D. Mass.), counsel for the plaintiff, Hartford Fire Insurance Company, and counsel for the defendant, Town of Weston, have conferred and submit the following:

I. PROPOSED AGENDA OF MATTERS TO BE DISCUSSED AT SCHEDULING CONFERENCE

Establishment of pretrial schedule, including discovery, motions and case management conferences.

II. PROPOSED PRETRIAL SCHEDULE

A. Joint Discovery Plan

<u>Event</u>	<u>Deadline</u>
Service of Rule 26 Initial Disclosures	01/15/06
All motions under Fed. R. Civ. P. 12, 19 and 20 filed	03/31/06
Completion of Party and Fact Witness Depositions	08/31/06
Deadline for plaintiff's expert disclosures	09/30/06

Deadline for defendant's expert disclosures	11/30/06
Deadline for plaintiff's expert's response to defendant's expert's disclosure	12/31/06
Completion of Trial Expert Depositions	01/31/07
Deadline to file Summary Judgment Motions	02/15/07

III. MAGISTRATE JUDGE

The parties do not consent to trial by a magistrate judge.

**IV. CERTIFICATION OF CONFERENCE REGARDING BUDGET AND
ALTERNATIVE DISPUTE RESOLUTION**

The parties will file their certifications pursuant to Local Rule 16.1(D)(3) under separate cover.

Respectfully submitted,

HARTFORD FIRE INSURANCE
COMPANY,

By its attorneys,

/s/ Eric H. Loeffler
Bradford R. Carver, BBO #565396
Eric H. Loeffler, BBO#641289
Hinshaw & Culbertson LLP
One International Place, Third Floor
Boston, Massachusetts 02110
(617) 213-7000

AND

TOWN OF WESTON,

By its attorneys,

/s/ John P. Martin
Joseph A. Barra, BBO#632534
John P. Martin, BBO#637667
Gadsby Hannah LLP
225 Franklin Street

Boston, MA 02110
(617) 345-7000